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 15 NEO4J, INC. and NEO4J SWEDEN AB

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 NEO4J, INC., a Delaware corporation, and
 19 NEO4J SWEDEN, AB, a Swedish
 20 corporation,

21 Plaintiffs,

22 v.

23 PURETHINK LLC, a Delaware limited
 24 liability company, IGOV INC., a Virginia
 25 corporation, and JOHN MARK SUHY, an
 26 individual,

27 Defendants.

28 AND RELATED COUNTERCLAIMS.

29 NEO4J, INC., a Delaware corporation, and
 30 NEO4J SWEDEN AB, a Swedish
 31 corporation,

32 Plaintiffs,

33 v.

34 GRAPH FOUNDATION, INC., an Ohio
 35 corporation, GRAPHGRID, INC., an Ohio
 36 corporation, and ATOMRAIN INC., a
 37 Nevada corporation,

38 Defendants.

CASE NO. 5:18-cv-07182-EJD

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR FURTHER MODIFICATION
 OF PHASE 1 SUMMARY JUDGMENT
 BRIEFING SCHEDULE**

CASE NO. 5:19-cv-06226-EJD

STIPULATION

Plaintiff and Counter-Defendants Neo4j, Inc. and Neo4j Sweden AB (collectively “Plaintiffs”), Defendants and Counterclaimants PureThink LLC and iGov, Inc. and Defendant John Mark Suhy (collectively the “PureThink Defendants”) in the action entitled *Neo4j, Inc. et al v. PureThink LLC et al.* Case No. 5:18-cv-07182-EJD (“PT Action”) and Defendants Graph Foundation, Inc. (“GFI”), GraphGrid, Inc. and AtomRain Inc. in the related action entitled *Neo4j, Inc. v. Graph Foundation, Inc.*, Case No. 3:19-cv-06226-EJD (“GFI Action”), by and through the parties’ respective attorneys, hereby submit this stipulation as follows:

1. On September 10, 2020, the Court entered an order modifying the briefing schedule for the Phase 1 motions for summary judgment. PT Dkt. No. 87; GFI Dkt. No. 77. In that stipulation, the parties agreed that the last day for Plaintiffs to file their combined opposition/reply in the PureThink and GFI Actions would be February 15, 2021, which the parties did not recognize at that time was a Federal Court Holiday. *Id.*, ¶ 8. Pursuant to Federal Rule of Civil Procedure FRCP 6(a)(1)(C), Plaintiffs' brief is actually due on February 16, 2021.

2. In the interest of caution and for clarity, the parties agreed to submit this stipulation confirming the deadline for Plaintiffs to file their combined opposition/reply in the PureThink and GFI Actions is February 16, 2021.

3. The parties further agree that the last day for Defendants to file their combined reply brief in the PureThink and GFI Action shall be moved from March 8, 2021 to March 9, 2021 to offset the foregoing adjustment.

Event	Current Date	Proposed Date
Last Day for Plaintiffs to file their combined opposition/reply in the PT Action and GFI Action	February 15, 2021	February 16, 2021
Last Day for Defendants to file their combined reply brief in the PT Action and GFI Action	March 8, 2021	March 9, 2021
Hearing on motions for summary judgment, partial summary judgment and/or summary adjudication and a further Case Management Conference to set the schedule for Phase 2 in the PT Action and GFI Action	April 15, 2021. <i>See</i> PT Dkt. No. 105; GFI Dkt. No. 104.	No Change.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 Dated: February 1, 2021

3 HOPKINS & CARLEY
A Law Corporation

4 By: /s/ Jeffrey M. Ratinoff

5 Jeffrey M. Ratinoff
6 Attorneys for Plaintiffs NEO4J, INC. and
7 NEO4J SWEDEN AB

8 Dated: February 1, 2021

9 /s/ Adron W. Beene

10 Adron W. Beene
11 Attorneys for Defendants PURETHINK
12 LLC, IGOV INC., and JOHN MARK
13 SUHY

14 Dated: February 1, 2021

15 BERGESON, LLP

16 By: /s/ John D. Pernick

17 John D. Pernick
18 Attorneys for Defendant
19 GRAPH FOUNDATION, INC.

20 Dated: February 1, 2021

21 SKAGGS FAUCETTE LLP

22 By: /s/ Jeffrey E. Faucette

23 Jeffrey E. Faucette
24 Attorneys for Defendants GRAPHGRID,
25 INC. and ATOMRAIN INC.

26 IT IS SO ORDERED.

27 Dated: February 2, 2021

28 
EDWARD J. DAVILA
United States District Court Judge

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all signatories for whom a signature is indicated by a “conformed” signature (/s/) within this electronically filed document and I have on file records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request.

Dated: February 1, 2021

HOPKINS & CARLEY
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

John V. Picone III
Jeffrey M. Ratinoff
Attorneys for Plaintiffs and
Counter-Defendants
NEO4J, INC. and NEO4J SWEDEN AB